

Wennes Communications Stations, Inc., licensee of KVIK(FM), Decorah, Iowa, and KHPP(AM)/KNEI-FM, Waukon, Iowa, respectfully comments in response to three of the Commission's localism proposals. The Commission's proposals seem geared to large market stations, which are significantly different from small market stations such as Wennes'. Adoption of some of the proposals would be a significant burden on small market stations and do nothing to improve their service to the public.

Wennes opposes the proposal to require all stations to man their main studio whenever broadcasting. It may be prohibitively expensive for a small market station to hire someone just to sit there and wait for the phone to ring. (Even the proverbial Maytag repairman gets more call than a typical station, and the calls which it does receive, based on our experience, are almost all during the business day.) If the Commission were to impose such a requirement, many stations would simply shut down during unprofitable hours, thus depriving the listening public with entertainment and information during those hours. Moreover, other competitors for advertising dollars, e.g. cable and satellite providers, are required to provide 24/7 live contact. Wennes is aware of no studies which weigh the costs and benefits of this proposal. Without such determination, it would be arbitrary for the Commission to impose this burden.

In sum, the public is simply not served by imposing on stations the proposed requirement to man them during all broadcast times .

With regard to the advisory board proposal, by their very nature, small market stations must be integrated into their communities. Management must be

involved in community affairs, or the station will not succeed. There is no need for the proposed community advisory boards here. The entire proposal smacks of a return to the formal ascertainment of years ago which the Commission rightly determined was an unnecessary burden on licensees.

The Commission must also consider that it previously sought to use a localism approach, but when push came to shove, it was not able to justify it. Until the Bechtel case in the early 1990s, the Commission gave significant credit to applicant for new stations who proposed “integration of ownership and management”. Necessarily, this required the station owner to participate full time in managing station affairs, and to live in or near the community of license. Nevertheless, when called by the Court of Appeals to justify that this approach resulted in a better station, more responsive to community needs and interests, the Commission was unable to do so. As a result the Commission resorted to auctioning new facilities, having realized that the highest bidder was the one who would make the best use of the spectrum and provide the best service to its listeners.

The Commission has permitted broadcasters to determine how best to serve the public in their own listening area. Dictating how stations make this determination, and imposing onerous and costly obligations on small market stations, will not improve their service.

Many stations operate on a thin margin. Stations must pay annual regulatory fees to the Commission, bi-annual ownership report fees, and renewal application fees, even if they make no other application to the Commission from year to year. They also must pay music license fees and other costs not imposed on

newspapers, the internet, and others who compete for the advertising dollar. It is well known that advertising on radio is down lately; the recession affects the ability of advertisers to purchase time. The Commission must be careful not to burden broadcasters with unneeded and costly procedures, which may result in stations being less able to provide the public interest programming which the Commission finds lacking in some communities.

We request that the Commission not burden small market stations with the localism requirements proposed in the Notice.

Respectfully submitted,

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